

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: John A D'Andrea, Jr
Debtor

SN Servicing Corporation as servicer
for U.S. Bank Trust National
Association as Trustee of the Chalet
Series III Trust
Movant

v.

John A D'Andrea, Jr
Christine M. D'Andrea- Co-Debtor
William C. Miller - Trustee
Respondents

CASE NO.: 19-10865-elf

CHAPTER 13

JUDGE: Eric L. Frank

CERTIFICATION OF DEFAULT

FRIEDMAN VARTOLO, LLP, attorneys for Movant, hereby certifies that the above-captioned Debtor has failed to comply with the terms of the Stipulation approved by the U.S. Bankruptcy Judge Eric L. Frank on December 15, 2020. A copy of the Stipulation is attached hereto as **Exhibit "A"**. Debtor is currently due for the August 1, 2021 payment at \$1,332.61, plus accrued late charges in the amount of \$80.68. The total post-petition arrears due is \$2,745.90, which includes the currently due September 1, 2021 payment of \$1,332.61. In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtor's property.

Dated: September 23, 2021

By: /s/ Lorraine Gazzara Doyle
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